UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

CHRISTY J. MATHIS and PAUL J. MATHIS

Plaintiffs,

Case No. 22-cv-47-JDP

v.

BRIAN BRZEZINSKI, JULIE BRZEZINSKI, and a minor child, A.B.

Defendants

MOTION TO CONTINUE DEFAULT IUDGMENT HEARING DATE

COME NOW Plaintiffs, Christy J. Mathis and Paul J. Mathis, through their counsel, and respectfully request a continuance of the Default Judgment Hearing currently set for August 1, 2023. In support of this Motion, Plaintiffs state as follows:

- 1. On June 30, 2023, Plaintiffs filed a motion for default judgment against Defendants, Brian Brzezinski, Julie Brzezinski, and a minor child, A.B., pursuant to FED. R. CIV. P. 55(b)(2).
- 2. On July 5, 2023, the Court set a Default Hearing for August 1, 2023 at 08:30 AM by telephone.
- 3. Plaintiffs' lead counsel, Paul M. Secunda, recently became engaged, and Attorney Secunda's wedding is on July 29, 2023, and his honeymoon scheduled for two weeks immediately subsequent, from July 30, 2023, to August 13, 2023, conflict with the current Default Judgment Hearing.
- 4. This motion is made in good faith and not for the purpose of hindrance or undue delay. Plaintiffs' counsel has brought this matter to the Court's attention as soon as it became clear that there would be a conflict between his wedding and honeymoon dates and the Default Judgment Hearing

date in this matter.

WHEREFORE, Plaintiffs respectfully request that this Motion to Continue the Trial Date be granted and that a new default judgment hearing date be set after August 14, 2023.

Dated: July 5, 2023 Respectfully Submitted,

s/ Paul M. Secunda

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